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Counsel for Defendants Vegas Affordable Stone and Tile, Inc.,
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
DEFINED CONTRIBUTION PENSION TRUST
FOR SOUTHERN NEVADA; TRUSTEES OF
THE BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 HEALTH
BENEFITS FUND; TRUSTEES OF THE
BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 VACATION
FUND; BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 NEVADA;
TRUSTEES OF THE BRICKLAYERS &
TROWEL TRADES INTERNATIONAL
PENSION FUND; TRUSTEES OF THE
BRICKLAYERS & TROWEL TRADES
INTERNATIONAL HEALTH FUND; and
TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,

Plaintiffs,

vs.

COMMERCIAL UNION TILE & STONE, INC.,
a Nevada corporation; VEGAS AFFORDABLE
STONE AND TILE, INC., a Nevada corporation;
STONE CONSULTING, LLC, a Nevada limited
liability company; JONATHAN WILLIAM
CANJA, individually; and JEDEDIAH
MICHAEL FELLER, individually,

Defendants.

CASE NO.: 2:15-cv-02129-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSES
TO PENDING MOTIONS FOR
SUMMARY JUDGMENT AS BETWEEN
PLAINTIFFS AND DEFENDANTS
VEGAS AFFORDABLE STONE AND
TILE, INC., STONE CONSULTING, LLC,
AND JEDEDIAH MICHAEL FELLER**

(THIRD REQUEST)

1 Plaintiffs, by and through their undersigned counsel, and Defendants Vegas Affordable
2 Stone and Tile, Inc., Stone Consulting, LLC, and Jedediah Michael Feller (collectively,
3 “Stipulating Defendants”), by and through their undersigned counsel, stipulate and agree to
4 further extend the deadline to file responses to the following pending motions for summary
5 judgment from February 13, 2017 to March 13, 2017:

6 Defendant Jedediah Feller’s Motion for Summary Judgment (dkt. # 53);

7 Plaintiffs’ Motion for Summary Judgment as against Stipulating Defendants only (dkt. #
8 54);

9 Defendant Vegas Affordable Stone and Tile, Inc.’s Motion for Summary Judgment (dkt.
10 # 55);

11 Defendant Stone Consulting, LLC’s Motion for Summary Judgment (dkt. # 56);

12 This is the third request for an extension of time for these deadlines, and the request is not
13 made for the purpose of delay. The parties to this stipulation have reached a settlement
14 agreement in principle and are in the process of finalizing the language for a written agreement.
15 The remaining defendants, Commercial Union Tile & Stone, Inc. and Jonathan William Canja,
16 are not parties to the aforementioned settlement or to this stipulation. The parties to this
17 stipulation submit that good cause appears for the extension, and they continue to wish to
18 dedicate time and resources to the resolution without incurring additional litigation expense.
19 Although stated in the previous stipulation in this matter, the parties to this stipulation anticipate
20 this to be their last request for such an extension in this matter and expect to have the written
21 agreement executed prior to the

22 ///

28 ///

1 new response deadline.

2 Dated this 8th day of February, 2017.

3 GARG GOLDEN LAW FIRM

THE URBAN LAW FIRM

4 By /s/ Anthony B. Golden

5 Anthony B. Golden, Esq.
6 3185 St. Rose Parkway, Suite 325
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(702) 850-0202

7 *Counsel for Vegas Affordable Stone and*
8 *Tile, Inc., Stone Consulting, LLC, and*
Jedediah Michael Feller

By /s/ Nathan R. Ring

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Nathan R. Ring, Esq.
4270 S. Decatur Blvd., Suite A-9
(702) 968-8087

Counsel for Plaintiffs

10 **ORDER**

11 IT IS SO ORDERED:

12 

13 UNITED STATES DISTRICT JUDGE

14 Dated: February 8, 2017.